



**STATE OF NEVADA**

**BEFORE THE NEVADA COMMISSION ON ETHICS**

In re **Paul Hamilton**, Member,  
Carson City Airport Authority,  
State of Nevada,

Ethics Complaint  
Case No. 21-014C

\_\_\_\_\_  
Subject. /

**REVIEW PANEL DETERMINATION**  
NRS 281A.730; NAC 281A.440

The Nevada Commission on Ethics (“Commission”) received this Ethics Complaint on March 1, 2021, regarding the alleged conduct of Subject Paul Hamilton (“Hamilton”). On April 15, 2021, the Commission instructed the Executive Director to investigate alleged violations of NRS 281A.400(1), (2), (5), (9) and NRS 281A.420(3).

Hamilton is a public officer as defined in NRS 281A.160, and the Commission has jurisdiction over this matter pursuant to NRS 281A.280 because the allegations contained in the Complaint relate to Hamilton’s alleged conduct as a public officer/employee and have associated implications under the Ethics Law.

On October 20, 2021, a Review Panel consisting of Commissioners Gruenewald (Presiding Officer), Lowry and Yen reviewed the following: (1) Ethics Complaint; (2) Order on Jurisdiction and Investigation; and (3) Executive Director’s Recommendation to the Review Panel with a Summary of Investigatory Findings.<sup>1</sup>

Under NAC 281A.430, the Review Panel unanimously finds and concludes that there is not sufficient credible evidence to support a determination that just and sufficient cause exists for the Commission to render an opinion in the matter regarding the allegations pertaining to NRS 281A.400(5) and NRS 281A.420(3).

However, the Review Panel unanimously finds and concludes that the facts establish credible evidence to support a determination that just and sufficient cause exists for the Commission to render an opinion in the matter regarding the alleged violations of NRS 281A.400(1), (2) and (9). Nevertheless, pursuant to NRS 281A.730, the Review Panel reasonably believes that Hamilton’s conduct may be appropriately addressed through corrective action under the terms and conditions of a deferral agreement instead of referring these allegations to the Commission for further proceedings at this time. The deferral agreement must confirm Hamilton’s acknowledgement of the following:

- Compliance with the Ethics Law for a period of 2 years after approval of the deferral agreement, including:

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<sup>1</sup>All materials provided to the Review Panel, except the Ethics Complaint and the Order on Jurisdiction and Investigation, represent portions of the investigatory file and remain confidential pursuant to NRS 281A.750.

1. Hamilton does not become the subject of another ethics complaint arising from an alleged violation of the Ethics Law during the deferral period for any conduct as a public officer or employee under the Commission's jurisdiction for which the review panel determines that there is just and sufficient cause for the Commission to render an opinion in the matter.
  2. Hamilton must file an Acknowledgement Form required by NRS 281A.500 within 30 days after approval of the deferral agreement.
  3. Hamilton must attend ethics training within 6 months of the Review Panel's approval of the deferral agreement.
  4. Hamilton must encourage the Authority Manager, Chair, and members of the Board to participate in ethics training.
  5. The deferral agreement will serve as the Review Panel's public reprimand of Hamilton's conduct.
- The Executive Director's authority to monitor compliance with the deferral agreement.
  - The obligation to comply with the terms of the deferral agreement and consequences associated with noncompliance, including the authority of the Review Panel to refer the Complaint to the Commission for further proceedings, which could include an adjudicatory hearing on the merits.
  - Upon satisfactory compliance with the deferral agreement, the Complaint will be dismissed.

Unless an extension of time is authorized or directed by the Commission Counsel on behalf of the Review Panel, the Executive Director and Subject shall provide a proposed deferral agreement to the Review Panel through its Commission Counsel on or before November 15, 2021, which deadline may be extended by Commission Counsel for good cause. If the Review Panel does not approve the deferral agreement or if the Subject declines to enter into a deferral agreement, the Review Panel will issue an order referring this matter to the Commission for further proceedings.

Dated this 20<sup>th</sup> day of October, 2021.

#### REVIEW PANEL OF THE NEVADA COMMISSION ON ETHICS

By: /s/ Barbara Gruenewald  
Barbara Gruenewald, Esq.  
Commissioner/Presiding Officer

By: /s/ Amanda Yen  
Amanda Yen, Esq.  
Commissioner

By: /s/ Teresa Lowry  
Teresa Lowry, Esq.  
Commissioner

**CERTIFICATE OF MAILING**

I certify that I am an employee of the Nevada Commission on Ethics and that on this day in Carson City, Nevada, I transmitted a true and correct copy of the foregoing **REVIEW PANEL DETERMINATION** via U.S. Certified Mail and electronic mail addressed as follows:

Paul Hamilton  
2167 Table Rock Drive  
Carson City, NV 89706

Certified Mail No.: 9171 9690 0935 0037 6364 15

Email: [paul@sportaviationcenter.com](mailto:paul@sportaviationcenter.com)

Dated: 10/21/21

  
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Employee, Nevada Commission on Ethics